

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION

MIDWEST TRUST COMPANY, as
Administrator of the Estate of
Mark Bull, Deceased,
Plaintiff,

v.

SHERIFF JOHN D. LAKIN, COUNTY OF
MADISON, ILLINOIS, JOHN DOES, JANE
DOES, and ADVANCED CORRECTIONAL
HEALTHCARE, INC.,

Defendants.

Case No. 3:23-cv-1238

Agreed Stipulation to Voluntarily Dismiss
Pursuant to Fed. R. Civ. P 41(a)(1)(A)(ii)

Now comes Plaintiff, MIDWEST TRUST COMPANY, as Administrator of the Estate of Mark Bull, Deceased, by its attorneys, Ted N. Gianaris and Suvir Dhar, and for its Agreed Stipulation to Voluntarily Dismiss Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) states as follows:

1. The Federal Rules provide that a Plaintiff may voluntarily “dismiss an action without a court order by filing... a stipulation of dismissal signed by all parties who have appeared.” Fed. R. Civ. P. 41(a)(1)(A)(ii).
2. By the signature of their attorneys below, the parties stipulate and agree that an order dismissing Plaintiff’s Complaint without prejudice and terminating this matter should be entered.
3. The parties further stipulate and agree that payment of taxable costs shall be contingent upon refiling of the Complaint. Defendants waive payment of costs at this time but shall be entitled to payment of taxable costs incurred in this matter at the time of refiling should plaintiff decide to refile the action.

Respectfully submitted,

MIDWEST TRUST COMPANY, as
Administrator of the Estate of
Mark Bull, Deceased, Plaintiff

ADVANCED CORRECTIONAL
HEALTHCARE, INC., Defendant,

By: *s/Ted N. Gianaris*

Ted N. Gianaris
Joshua Edelson
Gianaris Trial Lawyers
One Court Street
Alton, IL 62002
tgianaris@lawforpeople.com

By: *s/Peter R. Jennetten (with consent)*

Peter R. Jennetten
QUINN JOHNSTON
227 N.E. Jefferson Ave.
Peoria, IL 61602-1211
pjennetten@quinnjohnston.com

MADISON COUNTY and JOHN
LAKIN, Defendants,

By: *s/Heidi L. Eckert (with consent)*

Heidi L. Eckert, #6271612
Blitz, Bardgett & Deutsch, LC
120 S. Central Avenue, Ste. 1500
St. Louis, MO 63105
heckert@bbdlc.com